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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 RICHARD JACKSON, et al.,
12 Plaintiffs,
13 v.
14 TWITTER, INC., et al.
15 Defendants.

Case No. 2:22-CV-09438-AB (MAA)

**DECLARATION OF PAVEN
MALHOTRA IN SUPPORT OF
THE JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

Judge: Hon. Andre Birotte, Jr.

Complaint Filed: December 29, 2022

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DECLARATION OF PAVEN MALHOTRA IN SUPPORT OF THE JOINT STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL COMPLAINT
Case No. 2:22-CV-09438-AB (MAA)

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DECLARATION OF PAVEN MALHOTRA

I, Paven Malhotra, declare:

1. I am an attorney licensed to practice law in the State of California and am a partner Keker, Van Nest & Peters LLP, located at 633 Battery Street, San Francisco, California, 94111, counsel for Defendants Meta Platforms, Inc. and Instagram, LLC. in the above-captioned action.

2. On December 29, 2022, Plaintiffs Richard Jackson, Julie Briggs, and Gregg Buchwalter ("Plaintiffs") filed the Complaint in the above-captioned matter against Meta Platforms, Inc. and Instagram, LLC. ("Meta").

3. On February 28, 2023, Meta was served with copies of the summons and the Complaint. The Complaint runs 137 pages, contains 405 paragraphs, contains five causes of action, and lists eleven different defendants. Given the length of the Complaint, I determined that Meta could benefit from additional time to analyze the allegations and also discuss the allegations with Plaintiffs' counsel. Based upon my conversations with other counsel, I understood that Twitter, Inc., Google, LLC, Amazon.com, Inc., YouTube LLC, and the DNC Services Corporation could also benefit from additional time to review and analyze the Complaint.

4. On March 14, 2023, I corresponded with Michael E. Reznick, counsel for Plaintiffs, and we agreed to extend the response deadline to April 21, 2023 for Meta and the other defendants seeking relief through this Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in San Francisco, California, on March 21, 2023.

/s/ Paven Malhotra
PAVEN MALHOTRA